

Evaluation of CAT's Comments Concerning Revisions to the Regulations

The California Association of Toxicologists (CAT) did not submit specific regulation revision concepts, but rather a summary of comments made by CAT members during a series of meetings concerning proposed revisions to the Department of Health Services' Title 17 regulations. The comments more than anything else indicate the apparent diversity of opinion among CAT members concerning the current regulations and the need or revisions. Thus, for example regarding the Title 17 regulations themselves, some comments recommended only slight modifications, while others recommended a complete reorganization and streamlining. There was similar disagreement on the value of the current requirements for personnel qualification. Finally, there were some general comments expressing the need to retain DHS oversight, while others saw the need to eliminate DHS oversight, relying instead on judicial review.